

EPA SLN No. KS120002

Registration Details

Company: 7173 LIPHATECH, INC.

Risk Mgr: RM 09 Section 18, Registration Division, Risk Management Team 5 ...

Organization: RD / RIMUERB ...

Current Status: Under Review (21-Aug-2012)

Reg. Number: KS120002 Pesticide Type: Conventional Chemical High Exposure? ☐

Feed Use: ☐ Yes ☒ No WPS Written Notification: ☐ Yes ☒ No No Ingredient? ☐

New Use: ☐ Yes ☒ No

Latest Approved Label:

Nature Of Need: There is no EPA-registered pesticide product which, under the cont...

Formulation Property Receipts Restricted Use Reg. Expiration Date

Related Section 3 Products Transfer History Toxicology Mode Of Action FR Notice

Product Name Ingredient Pesticide Category Application Reason Use Patterns

Product Name	Name Status
ROZOL PRAIRIE DOG BAIT	Full Text Active

WPS-PPE

Label Image

Container Info

Tracking

Status

Sites/Pests

CSF

Data Requirements

Inert Ingredients

24(C) CHECKLIST

STATE: <u>KANSAS</u>	SLN NO. <u>KS120002</u>
DATE REGISTERED: <u>06-26-2012</u>	90-DAY DATE: <u>09-26-2012</u>
SPECIFIC SPECIAL LOCAL NEED: _____	SITE: _____
_____	PEST/PROBLEM: _____
_____	_____

1. Is the State certified to issue this type of registration? _____
2. Was the EPA Application/Notification Form submitted? _____
3. Was all the required information included on the form? _____
4. Was a confidential formula submitted (for new products)? _____
5. Is this registration for a "CHANGED USE PATTERN"? _____
6. Has an FR document been prepared for this "CHANGED USE PATTERN"? _____
7. Tolerances required? _____ Established? _____ Citation: _____
8. Full labeling being used? _____ Supplemental directions? _____
9. Does label state "FOR DISTRIBUTION AND USE ONLY WITHIN (State)"? _____
10. Does full label comply with 40 CFR 162.10, as follows:
 - a. Product name, brand or trademark? _____
 - b. Name and address of registrant? _____
 - c. Net contents? _____
 - d. Product registration number? _____
 - e. Producing establishment number? _____
 - f. Ingredient statement? _____
 - g. Precautionary labeling? _____
 - h. Directions for use for special local need? _____
 - i. Use classification? _____

Was proper format followed? _____

11. Is supplemental directions for use labeling satisfactory? _____
12. Was supplemental labeling compared with EPA-registered label? _____

COMMENTS: _____

1. SLN No. KS120002 2. PM 09 3. Action Code _____

4. State Issue Date

0	6	2	6	1	2
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5. Date Received by EPA

0	8	1	7	1	2
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6. Date Received by PM

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7. Chemical Name _____

8. Chemical Code _____

9. Use _____

10. Reviews requested:

	Date Sent	Date Due	Date Returned	Response Code	Response Date
HED					
HFB					
RCB					
EEB					
TB					
RD					
S					
Precaution					
Labeling					
Chemistry					
Efficacy					

11. Status _____

12. Final Action: Response Code _____

Response Date

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United States Environmental Protection Agency
Office of Pesticide Programs, Registration Division (7505C)
Washington, DC 20460

**Application for/Notification of State Registration
of a Pesticide To Meet a Special Local Need**
(Pursuant to section 24(c) of the Federal Insecticide,
Fungicide, and Rodenticide Act, as Amended)

For State Use Only

Registration No. Assigned

Date Registration Issued

1. Name and Address of Applicant for Registration

Liphatech, Inc.
3600 W. Elm Street
Milwaukee, WI 53209

2. Product is (Check one)

EPA-Registered



EPA Registration Number

7173-286

New (not EPA-registered)

Attach EPA Form 8570-4, Confidential Statement of
Formula for new products.

EPA Company Number

7173-WI-1

3. Active Ingredient(s) in Product

chlorophacinone

4. Product Name

Rozol Prairie Dog Bait

6. Type of Registration (Give details in Item 13 or on a separate
page, properly identified and attached to this form):☐ a. To permit use of a new product.☒ b. To amend EPA registrations for one or more of the following purposes:☐ (1) To permit use on additional crops or animals.☐ (2) To permit use at additional sites.☐ (3) To permit use against additional pests.☒ (4) To permit use of additional application techniques or equipment.☐ (5) To permit use at different application rates.☐ (6) Other (specify below)10. Has FIFRA section 24(c) registration for this use of the
product ever, by another State, been (check appropriate
box(es), if known):☐ Sought☐ Issued☐ Denied☐ Revoked

If any of the above are checked, list States in Item 13 below.

☒ No FIFRA section 24(c) Action

Certification

I certify that the statements I have made on this form and all attachments
thereto are true, accurate, and complete. I acknowledge that any
knowingly false or misleading statement may be punishable by fine or
imprisonment or both under applicable law.

Signature of Applicant or Authorized Representative

Title

Manager of Regulatory Affairs

Telephone Number

(414) 410-7230

Date

June 20, 2012

Determination by State Agency

This registration is for a Special Local Need and is being issued in accordance with section 24(c) of FIFRA, as amended. To the best of our
knowledge, the information above is correct, except as noted in "Comments" below or in attachments.

Name, Title, and Address of State Agency Official

Judith L. Glass, Pesticide Registration Specialist
Pesticide and Fertilizer Program
Kansas Department of Agriculture
901 SW 9th Street
Topeka, KS 66612

Title

Pesticide Registration Specialist

Telephone Number

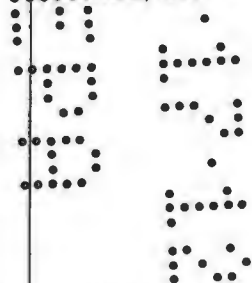
785-296-3454

Date

6/26/12

Comments (by State Agency Only)

Received by EPA



RESTRICTED USE PESTICIDE

DUE TO POTENTIAL SECONDARY TOXICITY TO NONTARGET ORGANISMS

For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification.

24(c) SUPPLEMENTAL LABEL

FOR DISTRIBUTION AND USE ONLY WITHIN THE STATE OF KANSAS

This label valid until March 15, 2013, or until otherwise amended, disapproved or withdrawn

rozol®

PRAIRIE DOG BAIT

EPA SLN No. KS-120002

EPA Registration No. 7173-286

EPA Est No. 7173-WI-1

**FOR APPLICATION BY MECHANICAL BAIT PLACEMENT MACHINE
TO CONTROL BLACK-TAILED PRAIRIE DOGS (*Cynomys ludovicianus*)
ON RANGELAND AND ADJACENT NONCROP AREAS**

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling, which includes this supplemental label and the label for Rozol Prairie Dog Bait, EPA Reg. No. 7173-286. Both of these labels must be in the possession of the user at the time of application. Follow all directions of this supplemental label and all applicable directions, restrictions and precautions on the label for EPA Reg. No. 7173-286.

Use restrictions: This product may only be used in underground applications to control black-tailed prairie dogs (*Cynomys ludovicianus*) on rangeland and noncrop areas in Kansas. Apply between October 1 and March 15 of the following year, when animals will most readily take the grain bait. This product is toxic to nontarget wildlife and fish. Do not allow bait to be placed outside of the prairie dog burrow. Do not allow children, pets, domestic animals or persons not involved in the application to be in the area where the product is being applied. Do not allow livestock to graze in treated areas for 14 days after treatment and when no bait is found above ground. Before applying this product, identify active prairie dog burrows by visual observation. The openings of active burrows will generally be free of leaves, seeds, other debris or spider webs, and will show freshly turned earth, and have prairie dog feces nearby.

Application: Apply 1/4 cup (53 grams or nearly 2 ounces) of bait at least 6 inches down active prairie dog burrows. Application may be made a mechanical bait application machine that is designed, constructed and operated in a manner that ensures that bait is properly placed at least 6 inches down the prairie dog burrows.

Make sure no bait is left on the soil surface at the time of application. Applicator must retrieve and dispose of any bait that is spilled above ground or placed less than 6 inches down the burrow entrance.

Mechanical bait application machines must be calibrated to ensure that the proper amount of bait is dispensed into each prairie dog burrow.

Follow-up: The applicator must return to the site within 4 days after bait application, and at 1 to 2 day intervals, to collect and properly dispose of any bait or dead or dying prairie dogs found on the surface. The applicator must follow all label instructions for conducting carcass searches, proper disposal of carcasses, and reapplication. (060612)

24(c) registrant

LIPHATECH®

Liphatech, Inc.
3600 W. Elm Street
Milwaukee, WI 53209
(414) 351-1478

PRECAUTIONARY STATEMENTS

Hazard to Humans and Domestic Animals

CAUTION: Harmful if swallowed or absorbed through the skin because it may reduce the clotting ability of blood and cause bleeding. Keep away from children, domestic animals and pets. Do not get in eyes, on skin or on clothing. All handlers (including applicators) must wear shoes plus socks, and gloves. Any person who retrieves carcasses or unused bait following application of this product must wear gloves.

USER SAFETY REQUIREMENTS: Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash hands thoroughly after applying bait and before eating, drinking, chewing gum, using tobacco or using the toilet and change into clean clothing.

FIRST AID: Have label when obtaining treatment advice.

If swallowed: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor.

If on skin: Take off contaminated clothing. Rinse skin with plenty of cool water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

TREATMENT FOR PET POISONING: If animal eats bait, call veterinarian at once.

NOTE TO PHYSICIAN OR VETERINARIAN: Contains chlorophacinone, an anticoagulant. If swallowed, this material may reduce the clotting ability of the blood and cause bleeding. For humans or dogs that have ingested this product and/or have obvious poisoning symptoms (bleeding or prolonged prothrombin times), give Vitamin K₁ intramuscularly or orally.

ENVIRONMENTAL HAZARDS: This product is toxic to fish and wildlife. Dogs and other predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten this bait. Do not apply directly to water, or to areas where surface water is present. Do not contaminate water by cleaning of equipment or disposal of wastes. Runoff also may be hazardous to aquatic organisms in water adjacent to treated areas.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in original container in a cool, dry place inaccessible to children and pets.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of in trash or at an approved waste disposal facility.

Container Handling: Nonrefillable container. Do not reuse or refill this container. Completely empty container, then offer for recycling or reconditioning; or puncture and dispose of in a sanitary landfill.

WARRANTY: To the extent consistent with applicable law, seller makes no warranty, expressed or implied, concerning use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of product when such use and/or handling is contrary to label instructions.

EPA Reg. No. 7173-286
EPA Est. No. 7173-WI-1

Product No. 84111
Label No. 150-5035-0812

RESTRICTED USE PESTICIDE DUE TO HAZARD TO NONTARGET ORGANISMS

For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's Certification.



Active Ingredient: chlorophacinone 0.005%
Inert Ingredients 99.995%
Total 100.000%

EPA Reg. No. 7173-286

EPA Est. No. 7173-WI-1

KEEP OUT OF REACH OF CHILDREN

CAUTION: See side panel for additional precautionary statements.

LIPHATECH®

Liphatech, Inc.
3600 W. Elm Street
Milwaukee, WI 53209
(800) 351-1476

Net Weight: 30 lbs. Pail

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

READ THIS LABEL and follow all use directions and precautions. Only use for sites, pests, and application methods specified on this label.

IMPORTANT: Do not expose children, pets, or other nontarget animals to rodenticides. To help prevent accidents:

1. Store product not in use in a location out of reach of children and pets.

2. Dispose of product container, unused, spoiled and unconsumed bait as specified on this label.

Use restrictions: This product may only be used as follows:

1. **Sites/Pests:** Black-Tailed Prairie Dogs (*Cynomys ludovicianus*) on rangeland and adjacent noncrop areas.

2. **States:** Colorado, Kansas, Montana, Nebraska, New Mexico, North Dakota, Oklahoma, South Dakota, Texas and Wyoming. Do not apply this product within the exterior boundaries of the Crow Reservation or the Blackfeet Reservation in Montana.

3. **Application Method:** Hand application of bait, at least 6 inches down prairie dog burrows. This product may only be used in underground applications. Do not apply bait on or above ground level. Treat only active burrows.

4. **Treatment Period:** Apply between October 1 and March 15 of the following year, when animals will most readily take the grain bait.

5. **Non-Applicators:** Do not allow children, pets, domestic animals or persons not involved in the application to be in the area where the product is being applied.

6. **Grazing Restriction:** Do not allow livestock to graze in treated areas for 14 days after treatment and when no bait is found above ground.

7. Do not use any other rodenticides containing anticoagulants (diphacinone) in prairie dog towns during the treatment period allowed on this label.

Endangered Species: It is a Federal offense to use any pesticide in a manner that results in the death of an endangered species. Use of this product may pose a hazard to endangered or threatened species. When using this product, you must follow the measures contained in the Endangered Species Protection Bulletin for the county in which you are applying the product. To obtain Bulletins, no more than six months before using this product, consult <http://www.epa.gov/espp/> or call 1-800-447-3813. You must use the Bulletin valid for the month in which you will apply the product.

Site Assessment: Before applying this product, identify active prairie dog burrows by visual observation. The openings of active burrows will generally be free of leaves, seeds, other debris or spider webs, and will show freshly turned earth, and have prairie dog feces nearby.

Application: Apply 1/4 cup (53 grams or nearly 2 ounces) of bait at least 6 inches down active prairie dog burrows. Make sure no bait is left on the soil surface at the time of application. Applicator must retrieve and dispose of any bait that is spilled above ground or placed less than 6 inches down the burrow entrance.

Follow-up: Prairie dogs that have eaten this bait will begin to die off 4 to 5 days after they eat a lethal amount. The applicator must return to the site within 4 days after bait application, and at 1 to 2 day intervals, to collect and properly dispose of any bait or dead or dying prairie dogs found on the surface. Carcass searches must be performed using a line-transect method that completely covers the baited area. Transect center lines must be not more than 200 feet (about 60 meters) apart, and should be considerably less if searches are conducted in more densely vegetated sites. Transect lines may be traveled on foot or by vehicle at a rate not to exceed 4 mph. All carcasses found above ground must be collected and disposed of properly. Continue to collect and dispose of dead or dying prairie dogs and search for non-target animals for at least two weeks, but longer if carcasses are still being found at that time. Carcass collection should occur in late afternoon, near sundown, to reduce the potential of nocturnal animals finding carcasses and dying animals. Bury carcasses on site in holes dug at least 18 inches deep or in inactive burrows (no longer being used by prairie dogs or other species) to avoid non-target animal scavenging. Burial includes covering and packing the hole or burrow with soil. If burial is not practical (due to frozen ground, etc.) and other disposal methods are allowed by state and local authorities, collected carcasses may be disposed of by other methods to insure that the carcasses are inaccessible to scavengers.

All dead or dying non-target animals must be reported to the National Pesticide Information Center 1-800-858-7378 as soon as possible. Any apparently injured or sick Federally listed species must also be immediately reported by calling 303-236-7540 (if located in Kansas, Nebraska, the Dakotas, Montana, Colorado or Wyoming) or 505-248-7889 (if located in Texas, New Mexico or Oklahoma). The Black-footed Ferret Coordinator must also be contacted if ferrets are found during Rozol Prairie Dog Bait applications or carcass searches at 970-897-2730 x224. If live black footed ferrets are found outside reintroduction sites, before, during or after Rozol Prairie Dog Bait application, the Black-footed Ferret Coordinator must be contacted immediately and sufficient time must be allowed for the FWS to capture and relocate the black-footed ferret(s) before Rozol Prairie Dog Bait application.

Reapplication: If prairie dog activity persists several weeks or months after the bait was applied, a second application may be made, by treating burrows in the same manner, time period and procedure as the first application. Follow all application, site assessment and follow-up directions and use restrictions as found above.

(072512)

RESTRICTED USE PESTICIDE
DUE TO HAZARD TO NONTARGET ORGANISMS
For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's Certificate.

ROZOL®

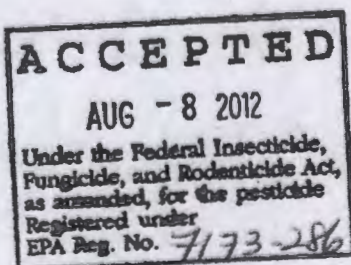
PRAIRIE DOG BAIT

Active Ingredient: chlorophacinone	0.005%
Inert Ingredients	99.995%
Total	100.000%

EPA Reg. No. 7173-286

EPA Est. No. 7173-WI-1

KEEP OUT OF REACH OF CHILDREN
CAUTION: See side panel for additional precautionary statements.



(Liphatech Logo)
Liphatech, Inc.
3600 W. Elm Street
Milwaukee, WI 53209
(414) 351-1476

Net Weight: 1 pound up to 2000 pounds

WARRANTY: To the extent consistent with applicable law, seller makes no warranty, expressed or implied, concerning use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of product when such use and/or handling is contrary to label instructions.

Side Panel:

PRECAUTIONARY STATEMENTS
Hazard to Humans and Domestic Animals

CAUTION: Harmful if swallowed or absorbed through the skin because it may reduce the clotting ability of blood and cause bleeding. Keep away from children, domestic animals and pets. Do not get in eyes on skin or on clothing. All handlers (including applicators) must wear shoes plus socks, and gloves. Any person who retrieves carcasses or unused bait following application of this product must wear gloves.

USER SAFETY REQUIREMENTS: Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash hands thoroughly after applying bait and before eating, drinking, chewing gum, using tobacco or using the toilet and change into clean clothing.

FIRST AID: Have label when obtaining treatment advice.

If swallowed: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor.

If on skin: Take off contaminated clothing. Rinse skin with plenty of cool water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

TREATMENT FOR PET POISONING: If animal eats bait, call veterinarian at once.

NOTE TO PHYSICIAN OR VETERINARIAN: Contains chlorophacinone, an anticoagulant. If swallowed, this material may reduce the clotting ability of the blood and cause bleeding. For humans or dogs that have ingested this product and/or have obvious poisoning symptoms (bleeding or prolonged prothrombin times), give Vitamin K₁ intramuscularly or orally.

ENVIRONMENTAL HAZARDS: This product is toxic to fish and wildlife. Dogs and other predatory and scavenging mammals and birds might be poisoned if they feed upon animals that have eaten this bait. Do not apply directly to water, or to areas where surface water is present. Do not contaminate water by cleaning of equipment or disposal of wastes. Runoff also may be hazardous to aquatic organisms in water adjacent to treated areas.

STORAGE AND DISPOSAL: Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in original container in a cool, dry place inaccessible to children and pets.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of in trash or at an approved waste disposal facility.

Container Handling: Nonrefillable container. Do not reuse or refill this container. **[Plastic:]** Completely empty container, then offer for recycling or reconditioning; or puncture and dispose of in a sanitary landfill. **[Paper:]** Completely empty container, then dispose of empty container in trash or at an approved waste disposal facility.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

READ THIS LABEL and follow all use directions and precautions. Only use for sites, pests, and application methods specified on this label.

IMPORTANT: Do not expose children, pets, or other nontarget animals to rodenticides. To help prevent accidents:

1. Store product not in use in a location out of reach of children and pets.
2. Dispose of product container, unused, spoiled and unconsumed bait as specified on this label.

Use restrictions: This product may only be used as follows:

1. **Sites/Pests:** Black-Tailed Prairie Dogs (*Cynomys ludovicianus*) on rangeland and adjacent noncrop areas.
2. **States:** Colorado, Kansas, Montana, Nebraska, New Mexico, North Dakota, Oklahoma, South Dakota, Texas and Wyoming. Do not apply this product within the exterior boundaries of the Crow Reservation or the Blackfeet Reservation in Montana.

3. **Application Method:** Hand application of bait, at least 6 inches down prairie dog burrows. This product may only be used in underground applications. Do not apply bait on or above ground level. Treat only active burrows.

4. **Treatment Period:** Apply between October 1 and March 15 of the following year, when animals will most readily take the grain bait.

5. **Non-Applicators:** Do not allow children, pets, domestic animals or persons not involved in the application to be in the area where the product is being applied.

6. **Grazing Restriction:** Do not allow livestock to graze in treated areas for 14 days after treatment and when no bait is found above ground.

7. Do not use any other rodenticides containing anticoagulants (diphacinone) in prairie dog towns during the treatment period allowed on this label.

Endangered Species: It is a Federal offense to use any pesticide in a manner that results in the death of an endangered species. Use of this product may pose a hazard to endangered or threatened species. When using this product, you must follow the measures contained in the Endangered Species Protection Bulletin for the county in which you are applying the product. To obtain Bulletins, no more than six months before using this product, consult <http://www.epa.gov/espp/> or call 1-800-447-3813. You must use the Bulletin valid for the month in which you will apply the product.

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Follow-up: Prairie dogs that have eaten this bait will begin to die off 4 to 5 days after they eat a lethal amount. The applicator must return to the site within 4 days after bait application, and at 1 to 2 day intervals, to collect and properly dispose of any bait or dead or dying prairie dogs found on the surface. Carcass searches must be performed using a line-transect method that completely covers the baited area. Transect center lines must be not more than 200 feet (about 60 meters) apart, and should be considerably less if searches are conducted in more densely vegetated sites. Transect lines may be traveled on foot or by vehicle at a rate not to exceed 4 mph. All carcasses found above ground must be collected and disposed of properly. Continue to collect and dispose of dead or dying prairie dogs and search for non-target animals for at least two weeks, but longer if carcasses are still being found at that time. Carcass collection should occur in late afternoon, near sundown, to reduce the potential of nocturnal animals finding carcasses and dying animals. Bury carcasses on site in holes dug at least 18 inches deep or in inactive burrows (no longer being used by prairie dogs or other species) to avoid non-target animal scavenging. Burial includes covering and packing the hole or burrow with soil. If burial is not practical (due to frozen ground, etc.) and other disposal methods are allowed by state and local authorities, collected carcasses may be disposed of by other methods to insure that the carcasses are inaccessible to scavengers.

All dead or dying non-target animals must be reported to the National Pesticide Information Center 1-800-858-7378 as soon as possible. Any apparently injured or sick Federally listed species must also be immediately reported by calling 303-236-7540 (if located in Kansas, Nebraska, the Dakotas, Montana, Colorado or Wyoming) or 505-248-7889 (if located in Texas, New Mexico or Oklahoma). The Black-footed Ferret Coordinator must also be contacted if ferrets are found during Rozol Prairie Dog Bait applications or carcass searches at 970-897-2730 x224. If live black footed ferrets are found outside reintroduction sites, before, during or after Rozol Prairie Dog Bait application, the Black-footed Ferret Coordinator must be contacted immediately and sufficient time must be allowed for the FWS to capture and relocate the black-footed ferret(s) before Rozol Prairie Dog Bait application.

Reapplication: If prairie dog activity persists several weeks or months after the bait was applied, a second application may be made, by treating burrows in the same manner, time period and procedure as the first application. Follow all application, site assessment and follow-up directions and use restrictions as found above.

MATERIAL SAFETY DATA SHEET

SECTION 1 PRODUCT & COMPANY IDENTIFICATION

Rozol® Prairie Dog Bait

EPA Reg. No. 7173-288, Restricted Use Pesticide

Other Designation: Anticoagulant rodenticide with Chlorophacinone
 Manufacturer: Liphatech, Inc.
 3600 W. Elm Street, Milwaukee, WI 53209

Emergency Phone: 414-361-1476 Monday-Friday, 8:00 am-4:30 pm CST
 After Hours: Call CHEMTREC at 1-800-424-9300

SECTION 2 INGREDIENT INFORMATION

Hazardous Ingredient	CAS Number	OSHA PEL	ACGIH TLV	ACGIH STEL
Chlorophacinone	3691-35-8	Not assigned	Not assigned	Not assigned

SECTION 3 HAZARDS IDENTIFICATION

Emergency Overview: May be harmful if swallowed or absorbed through the skin, because this material may reduce the clotting ability of the blood and cause bleeding.

Primary Entry Routes: Oral (swallowing), dermal (absorption through skin)

Acute Effects (Signs and Symptoms of Overexposure):

- Eyes: May cause temporary eye irritation.
- Skin: May be harmful if absorbed through skin. Symptoms of toxicity include lethargy, loss of appetite, reduced blood clotting ability and bleeding.
- Inhalation: Due to this product's solid form, inhalation is unlikely.
- Ingestion: May be harmful if swallowed. Symptoms of toxicity include lethargy, loss of appetite, reduced clotting ability of blood, and bleeding.

Chronic Effects: Prolonged and/or repeated exposure to small amounts of product can produce cumulative toxicity. Symptoms of toxicity include lethargy, loss of appetite, reduced clotting ability of blood, and bleeding.

Medical Conditions Aggravated by Exposure: Bleeding disorders

Target Organs: Blood

Carcinogenicity: Contains no known or suspected carcinogens.

HMS: Health - 2, Flammability - 0, Reactivity - 0

SECTION 4 FIRST AID MEASURES

Eyes: Flush with water. Get medical attention if irritation persists.

Skin: Wash with soap and water. Get medical attention if irritation persists.

Inhalation: If inhaled, remove person to fresh air and Get medical attention.

Ingestion: Call a physician or poison control center immediately. Have the product label available for medical personnel to read.

Induce vomiting under the direction of medical personnel. Drink 1 or 2 glasses of water and induce vomiting by touching the back of throat with finger. If syrup of Ipecac is available, give 1 tablespoon (15 mL) followed by 1 or 2 glasses of water. If vomiting does not occur within 20 minutes, repeat this dosage once. Do not induce vomiting or give anything by mouth to an unconscious person.

Note to Physician: This rodenticide contains an anticoagulant ingredient. If ingested, administer vitamin K₁ intramuscularly or orally, as indicated in bishydroxycoumarin overdoses. Repeat as necessary based on monitoring of prothrombin times.

For information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents) call the National Pesticide Information Center at 1-800-858-7376.

SECTION 5 FIRE FIGHTING MEASURES

Flash Point:	None
Autoignition Temp.:	Not determined
Explosive Limits:	LEL: Not applicable UEL: Not applicable
Extinguishing Media:	Use media suitable for the surrounding fire
Unusual Fire or Explosion Hazards:	None known
Fire Fighting Instructions:	Firefighters should wear self-contained breathing apparatus (full facepiece) and full protective clothing. Contain runoff to prevent pollution.



SECTION 6 ACCIDENTAL RELEASE MEASURES

Large Spill/Leak Procedures: Isolate and contain spill. Limit access to the spill area to necessary personnel. Do not allow spilled material to enter sewers, streams or other waters. Scoop up spilled material and place in a closed, labeled container for use or disposal.

Small Spills: Scoop up material for use according to label instructions.

SECTION 7 STORAGE AND HANDLING

Storage Requirements: Store in original container in a cool, dry area out of reach of children, pets and domestic animals. Do not contaminate water, food or feed. Keep container tightly closed. Do not remove or destroy the product label.

Handling Precautions: Read the entire product label before using this rodenticide. Carefully follow all cautions, directions and use restrictions on the label. Avoid contact with eyes, skin or clothing.

SECTION 8 EXPOSURE CONTROLS/ PERSONAL PROTECTION

Ventilation: Special ventilation is not required for the normal handling and use of this product when following the label instructions.

Protective Clothing/Equipment: Wear gloves when handling bait.

Respirator: None required when used according to label instructions.

Contaminated Equipment: Damaged or unwanted bait stations and bait holders should be wrapped in paper and discarded in trash.

Comments: Never eat, drink or smoke in work areas. Practice good personal hygiene after using this product. Wash arms, hands and face with soap and water after handling this product, and before eating and smoking. Launder contaminated clothing separate from street clothes.

SECTION 9 PHYSICAL & CHEMICAL PROPERTIES

Physical State:	Solid particles	Water Solubility:	Negligible
Color:	Green	% Volatile (Volume):	Not applicable
Odor:	Raw grain odor	Specific Gravity:	1.26 g/cc
Melting Point:	Not available	Vapor Pressure:	Not applicable
Boiling Point:	Not applicable	Vapor Density:	Not applicable
Freezing Point:	Not applicable	pH:	Not applicable

SECTION 10 STABILITY AND REACTIVITY

Stability: Stable

Conditions to Avoid: None

Hazardous Polymerization: Will not occur

Chemical Incompatibilities: None

Hazardous Products of Decomposition: Oxides of carbon

SECTION 11 TOXICOLOGICAL INFORMATION

Eye Effects/Eye Irritation:	Mild, transient irritant
Acute Oral Effects:	LD ₅₀ (oral-rat): >5000 mg/kg
Acute Inhalation Effects:	No data available
Acute Dermal Effects:	LD ₅₀ (dermal-rabbit): >2000 mg/kg
Skin Irritation:	Non-irritating
Skin Sensitization:	Not a skin sensitizer

SECTION 12 ECOLOGICAL INFORMATION

This product is toxic to fish and wildlife. Do not apply this product directly to water, where surface water is present or to intertidal areas below the mean high water mark. Carefully follow label cautions and instructions to reduce hazards to children, pets and non-target wildlife.

SECTION 13 DISPOSAL CONSIDERATIONS

Disposal: Wastes resulting from the use of this product according to the label instructions must be disposed of as specified on the product label.

RCRA Waste Status: This product is not regulated as a hazardous waste under RCRA. State and local regulation may affect the disposal of this product. Consult your state or local environmental agency for disposal of waste generated other than by use according to label instructions.

SECTION 14 TRANSPORT INFORMATION

Transportation Data (49 CFR): This product is not regulated as a hazardous material for all modes of transportation within the U.S.
 Hazard Class: Not applicable ID No.: Not applicable

SECTION 15 REGULATORY INFORMATION

TSCA: All components of this product are listed on the TSCA Inventory.

SARA Section 313: Contains no reportable components.

OSHA Hazard Classification: Chronic health hazard.

Proposition 65: Contains no components subject to warning requirements.

SECTION 16 OTHER INFORMATION

Prepared by: T. Schmit

Date: 7/8/2009

Information presented on this Material Safety Data Sheet is believed to be accurate at the time of publication. No warranty, expressed or implied, is made with regard to this information. This information may not be adequate for every application, and the user must determine the suitability of this information due to the manner/conditions of use, storage or local regulations.

RECEIVED
FEB 28 2011

Kansas Department of Agriculture
Pesticide and Fertilizer Program
109 SW 9th St., 3rd floor
Topeka, KS 66612
Incident #11JW15996
Page 1 of 3

Respondent:
Wallace County Noxious Weed Department
Attn: Bob Bolen
PO Box #70
Sharon Springs, KS 67758

Complainant:
KDA

SUMMARY

On 02-23-11 I conducted a routine ag use/24C investigation with the Wallace County Noxious Weed Department. The application was to pasture located in the S ½ 30-15-42W in Wallace County and was for the control of prairie dogs. The bait used was Liphatech Rozol Prairie Dog Bait (EPA reg. #7173-286) which is a Restricted Use Product. Both the full use and supplemental 24C labels were present and in the possession of the applicator, Bob Bolen, during the application. No label or other violations were observed.

NARRATIVE

02-22-11: On this date I contacted Bob Bolen who is the noxious weed director and prairie dog control supervisor for Wallace County. I indicated to him that I wished to conduct a routine ag use/24C investigation with the firm if the firm was going to conduct any prairie dog baiting with Rozol in the near future. He told me that weather permitting he intended to treat a pasture in the SW portion of Wallace County for prairie dogs the following day. I was to contact him early on the morning of 02-23-11 to verify whether or not this application was to be conducted and then we would plan accordingly.

02-23-11: At about 7:30am CST I contacted Mr. Bolen via his cell phone to inquire if he would be conducting any prairie dog baiting on this same date. He told me that he was planning to and arrangements were made to meet him at the junction of Hiway 27 and the Wallace-Greely county line at about 11:00am CST. This location is approximately fifteen (15) miles south of Sharon Springs, KS. He would then lead me to the pasture to be treated which was in extreme southwest Wallace County.

I met Mr. Bolen, whom I have met on several previous occasions, at the arranged time and location and I then following him to a pasture located in the S ½ 30-15-42W. Once we arrived there I presented Mr. Bolen with my KDA credentials and a Notice of Inspection (NOI) which detailed my reasons for being there. Mr. Bolen reviewed and then signed part I of the NOI. I then asked to see Mr. Bolen's commercial certification card. He provided this to me and he is commercially certified in Kansas with a certificate number of 3659 in subcategories 1C, 6, and 9A and the certificate is current through 12-31-13. He also showed me his Nebraska commercial certification card. This certification number was 082183 R in categories 7 and 14 and is current through 12-31-13.

I then asked to see a copy of the supplemental 24C label for Rozol and Mr. Bolen furnished me a copy for my records while still maintaining a copy to keep in his possession during the baiting application. This copy is included in this case file as Exhibit #1. Mr. Bolen also had full use labels on full product containers in the firm's service vehicle. We reviewed the label as to the following use restrictions and directions: dates of permitted applications, minimum 6 inches below top of burrow bait application/placement, use of gloves when handling bait, application rate of ¼ cup (approximately 2 oz.) per active burrow, retrieving and properly

disposing of any bait that is spilled above ground or inside the burrow within 6 inches of the entrance, and the required follow-up for carcass searching and proper disposal of carcasses, if any are found.

Various photographs of the Rozol containers and label, service vehicle and application equipment, application site, and applications were taken. The bait boxes mounted on the ATV were already loaded when we arrived, but Mr. Bolen told me that he used gloves during all handling of the product including loading of bait boxes. He does not always use gloves when triggering the metering device which is done by pressing a button mounted on the handle bar of the ATV and there is no chance of bait contact during this operation. The bait boxes and application tubes were mounted on a 4 wheeled ATV. The bait is dispensed using a metering device already mentioned. The metering device was tested by collecting the amount of bait dispensed into a container while triggering the dispensing device sixteen (16) times which should dispense approximately 32 oz. of bait product. This was verified by photo #004.

Mr. Bolen told me that there was an approximately 20 acre active prairie dog colony in this 240 acre pasture. No livestock were present at the time of application as verified by photos #034-035. The prairie dog colony was located in the SW ¼ of this pasture. I observed approximately 200-250 burrows being baited, which was approximately half of the colony to be treated, and an extensive visual search of this application site by this investigator found no misapplied or spilled Rozol bait being applied above ground or less than 6" below the soil surface. The wind was from the N at approximately 12 mph during the application.

At this time I completed a Use Investigation document which I had Mr. Bolen review and sign. Mr. Bolen estimated he would use approximately 60 lbs. of Rozol during this entire application. I then interviewed Mr. Bolen about the observed portion of the application and the necessary follow-up inspections required by the 24C label as concerns carcass searches, disposal of any found carcasses, and collection and disposal of any Rozol bait which might be found on the surface during these subsequent inspections. I then summarized my personal observations and interview of Mr. Bolen into a prepared statement. I then presented this prepared statement to Mr. Bolen for his review and subsequent signature if he agreed to its content. Upon his review of the prepared statement he then signed this prepared statement. I then completed a Receipt for Samples document listing the documentary evidence I had received during this portion of the use investigation. I also indicated on the Receipt for Samples document that the firm's statement of service for this application would be mailed to my home office within five (5) working days of the last follow-up inspection to this site made by the firm. Mr. Bolen agreed to this and then signed the Receipt for Samples document.

Mr. Bolen then showed me a homemade hand baiting device a business associate of his had constructed to be used for treated small numbers of active prairie dog burrows with Rozol. This device consisted of a caulking gun and various plastic pipe and fittings which were used to trigger a metering device which would dispense approximately ¼ cup of Rozol bait down the prairie dog burrow. This end of this device could be physically down the prairie dog burrow to ensure that the bait was applied per all full use and 24C supplemental label directions. Mr. Bolen allowed me to photograph this device during a demonstration (see photos #028-030). This device was verified to be calibrated by this investigator as shown in photos #031-032. This investigator was quite impressed by this hand baiting tool.

At this time I gave Mr. Bolen the firm's copy of all documents completed during this portion of the use investigation. I then asked Mr. Bolen if he had any further questions or comments concerning this use investigation or any other pesticide related matter. Finding that he had none I thanked him for his time and information and concluded this portion of the use investigation.

STATEMENT

FEB 23 2011

Case Number

11JZW15996

The following is a statement from Bob Boben who voluntarily gave this statement to Ferry Wilson who has identified himself/herself to me as an employee/representative of KDA. This statement was taken on 2-23-11 at Job Site.

During all mixing/loading + baiting application of Liphatech Rozol Prairie Dog Bait (EPA Reg # 7173-286) gloves were worn. The full use label + 24C label were on my possession during this application. The bait dispenser is calibrated to dispense $\frac{1}{4}$ cup (2 oz) per application cycle + this was verified by Mr. Wilson. The application rate I used was $\frac{1}{4}$ cup per active burrow by mechanical baiting. I am aware that 3-15-11 is the last application date for this season unless the 24C label is otherwise amended, disapproved, or withdrawn. The Rozol product was applied at least 6 inches down each active burrow. The application site is to pasture located on the SE ~~1/4~~ 36-15-42W which has no livestock present. No bait was left on the soil surface at the time of application. I will return to the application site within 4 days after bait application + at 1-2 day intervals to collect + properly dispose of any bait or dead or dying prairie dogs found on the surface. Any carcasses found during the follow-ups will be disposed of according to label directions. I am commercially certified in KS in subcategories 1C, 4, + 9A with certificate # 3659 which is current through 12-31-¹³~~12~~. I am commercially certified in Neb. with # NEB 082183 R in categories 7 + 14 which is current through 12-31-13.

I hereby affirm that I have read the foregoing statement and it is true to the best of my knowledge.

X Bob Boben
Signature

X Wallace Co.
Prairie Dog
Title

X 2-23-11
Date

X 785-821-0042
Phone Number

X Wallace Co.
Business Name

X P.O. Box 70

X Sharon Spgs, KS. 67758
Mailing Address

Ferry Wilson

FEB 28 2011

KDA Digital Photo Description Sheet
Case No. 11JW15996

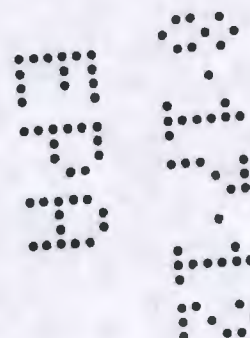
All photos in relationship to the investigation are included and have not been altered in anyway. Photos were taken on 02-23-11. All photos were taken by Jerry Wilson.

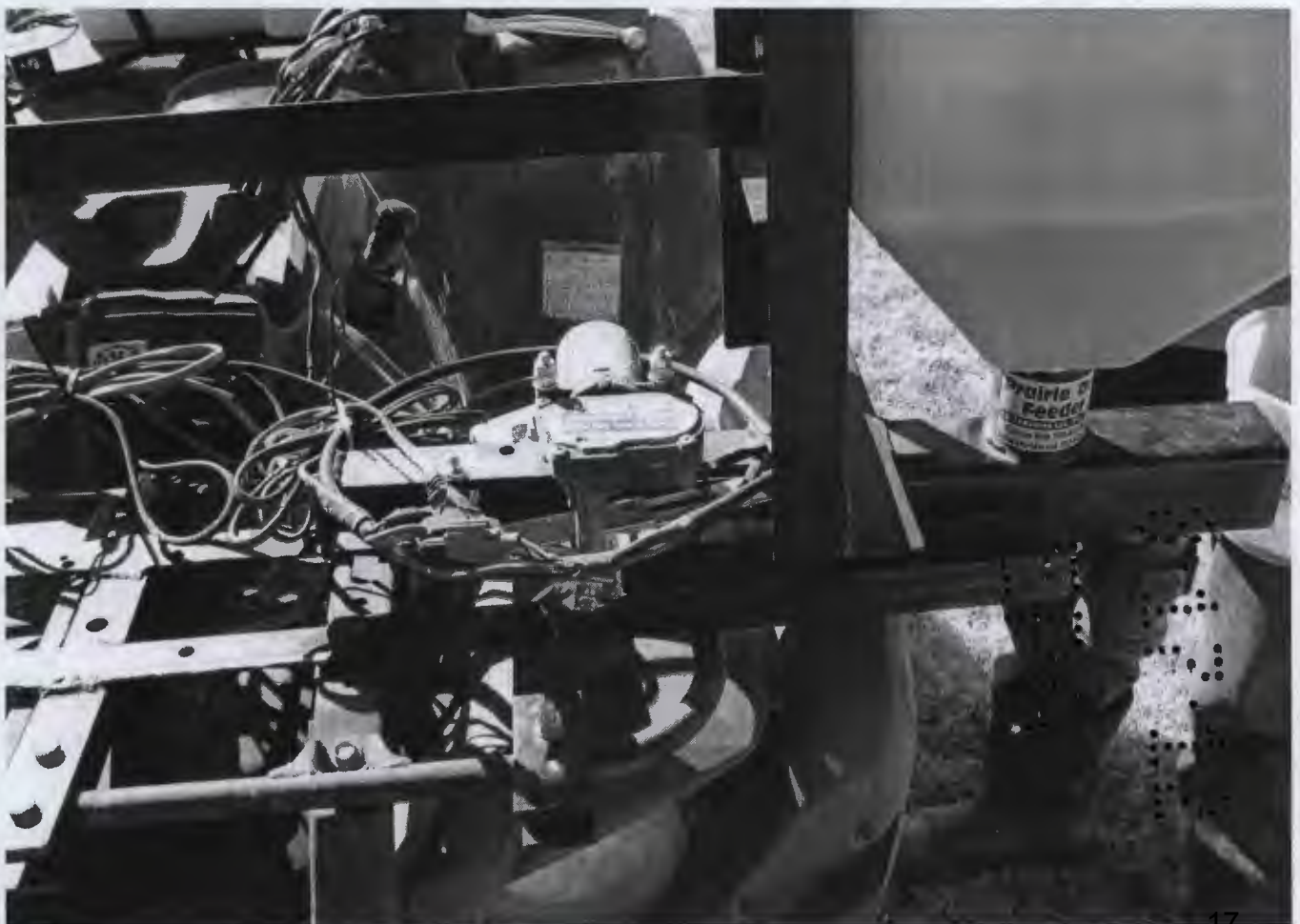
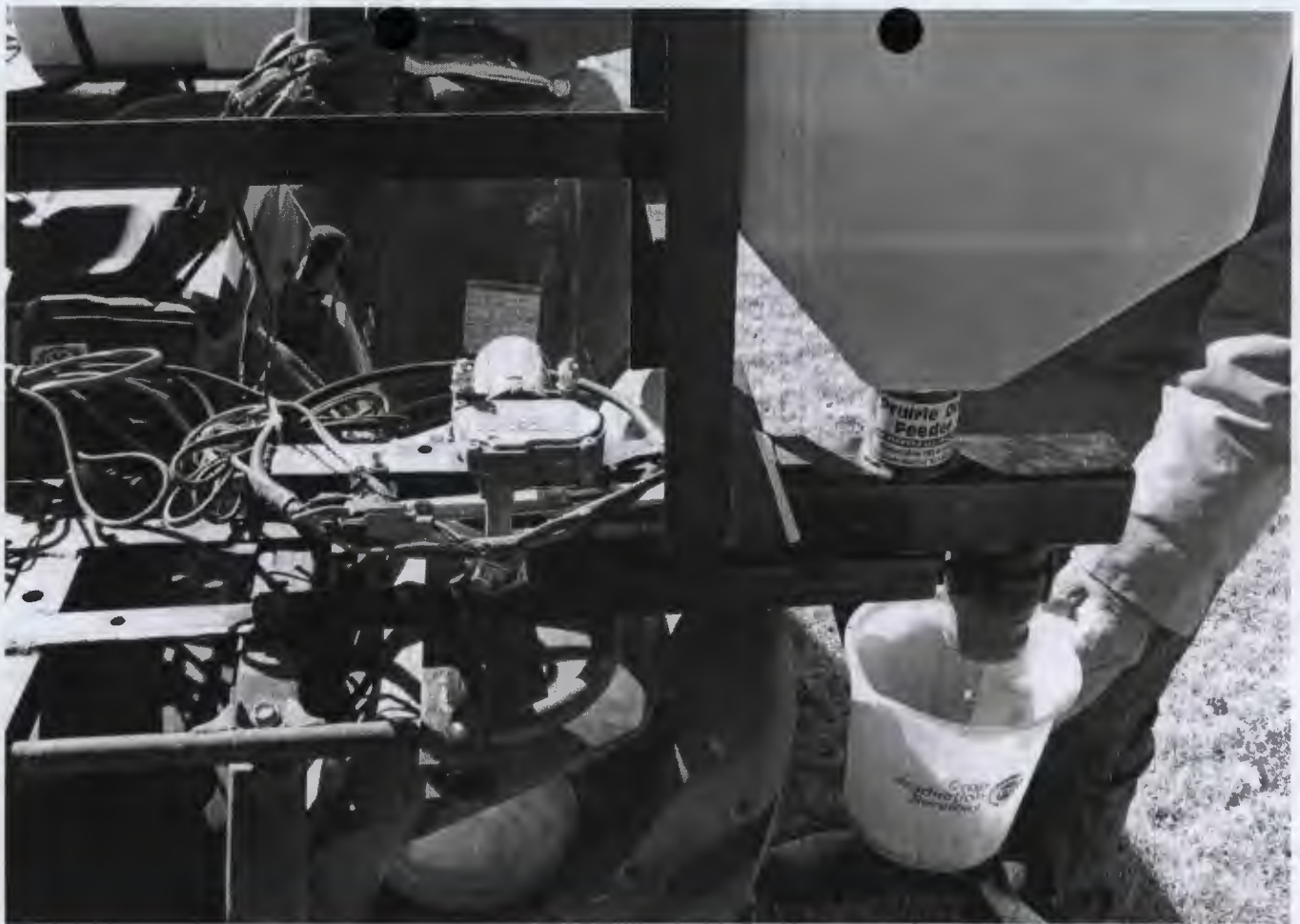
No.	Description	Facing
001	Photo of electronic piston device which measures out ¼ cup of the prairie dog bait per each time the device is triggered per a hand switch near the throttle of the ATV.	NA
002	Same as photo #001.	NA
003	Same as photos #001-002.	NA
004	The measured amount of Rozol dispensed after triggering the baiting device sixteen (16) times. Note the application rate is ¼ cup (approx. 2 oz.) per active burrow and the amount in the calibration cup is approximately 32 oz.	NA
005	Photo showing dual baiting boxes and baiting dispensing tubes mounted on the ATV. Note the tubes are only 2-4" off the surface of the ground.	NA
006	Photo of Liphatech Rozol Prairie Dog Bait (EPA reg. #7173-286) section 3 label affixed to the bait container.	NA
007	Close-up of photo #007.	NA
008	Photo of markings on Wallace County Noxious Weed Department service vehicle.	NA
009	Photo showing foam markings denoting where applications had been made.	S
010	Close-up of the foam markings.	S
011	Photo of an active prairie dog burrow that had just been baited with Rozol. Note the foam, ATV tracks, and no Rozol above ground.	S
012	Photo of same burrow as shown in photo #011. Note a small amount of Rozol shown at least 6" down the burrow. The rest of the Rozol went further down the burrow.	NA
013	Close-up of Rozol bait as shown in photos #011-012.	NA
014	Photo of a second active representative prairie dog burrow treated with Rozol bait. Note there is no above ground application or spillage.	NA
015	Photo of the Rozol bait applied at least 6" down the burrow of the burrow shown in photo #014.	NA
016	Photo showing foam marker dispensing marking foam denoting where applications have been made and also the height of the dispensing tubes in relation to the ground.	N
017	Photo of Bob Bolen just after he has treated another active prairie dog burrow.	NA
018	Photo of another active prairie dog burrow that had just been baited. Note no Rozol bait spilled or misapplied above ground. Also note the prairie dog dropping to the right of the burrow showing that it is an active burrow.	NA
019	Close-up of prairie dog dropping shown in photo #018.	NA

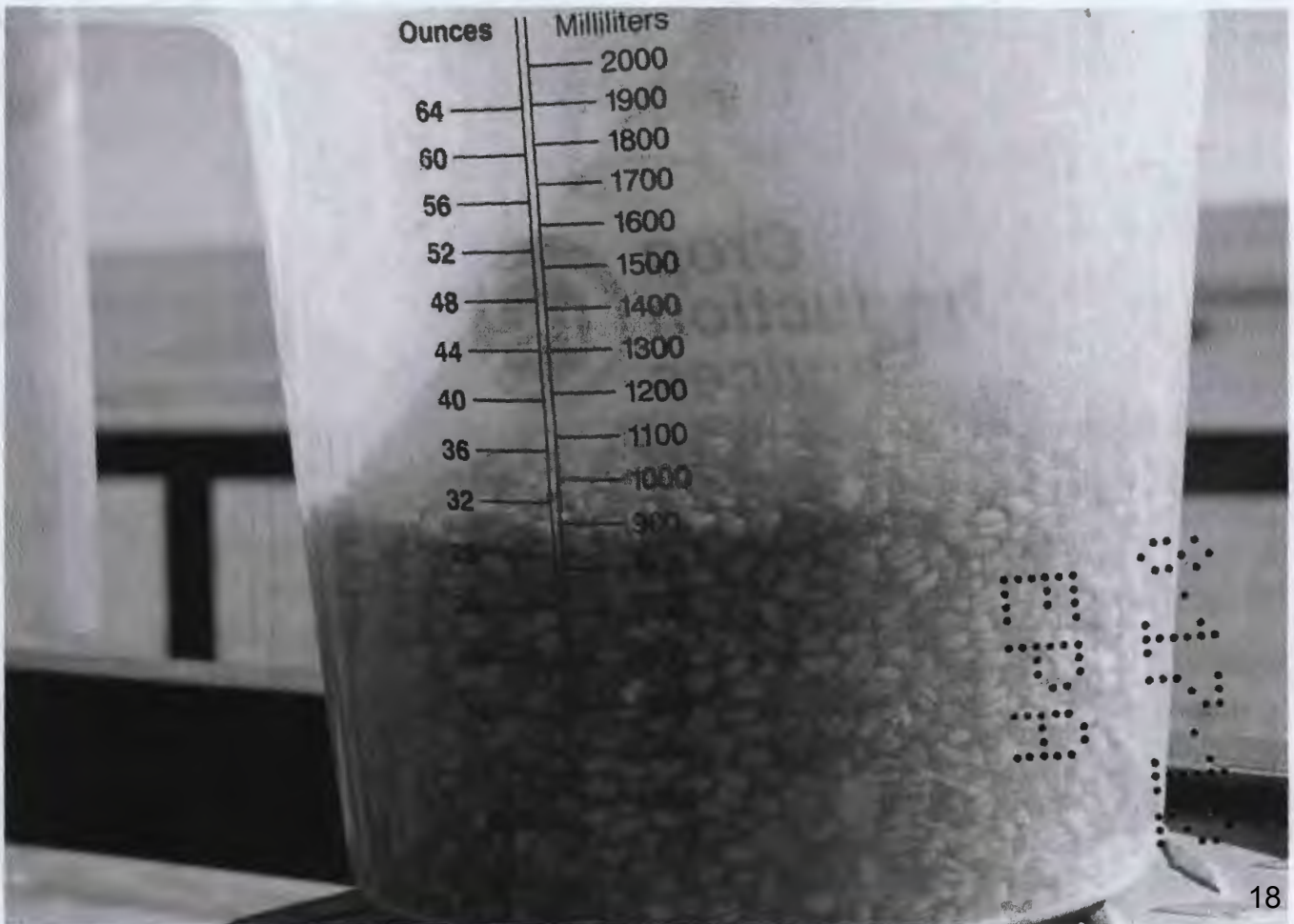
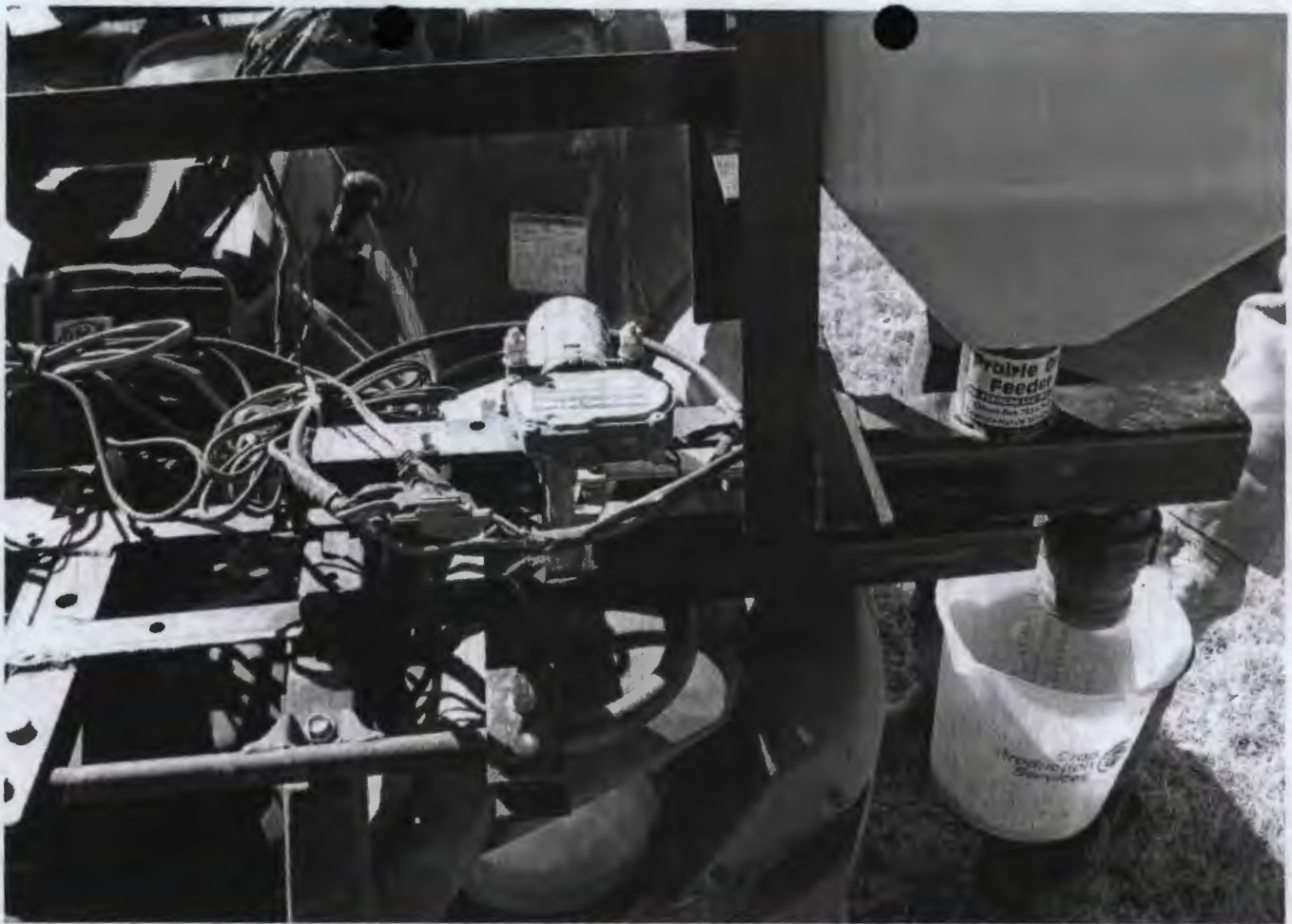
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FEB 28 2011

No.	Description	Facing
020	Photo of Mr. Bolen baiting another active prairie dog burrow.	NA
021	Close-up photo of Mr. Bolen treating another active prairie dog burrow. Note no misapplied Rozol bait.	NA
022	Same as photo #022.	NA
023	Same as photos #022-023.	NA
024	Same as photos #022-024.	NA
025	Same as photos #022-025.	NA
026	Another photo of areas of the active prairie dog colony which had been baited.	N-NE
027	Another photo of Mr. Bolen and application equipment.	N-NE
028	Photo of Mr. Bolen demonstrating a homemade hand baiting device (no application being conducted). The device is made of place pipe, caulking gun, and a trigger activated plunger which dispenses the Rozol bait in a calibrated amount.	N
029	Close-up of hand baiting device as shown in photo #028.	NA
030	Same as photo #029.	NA
031	Measured amount of Rozol bait which was dispensed when dispensing sixteen (16) doses of Rozol using the hand baiter. Note the total amount is again very close to 32 oz.	NA
032	Same as photo #031.	NA
033	Photo showing end of dispensing tube with measures 4" above the ground surface.	NA
034	Photo of pasture located in the S ½ 30-15-42W being baited for prairie dogs. Note there are no livestock present.	E
035	Same as photo #034.	NE

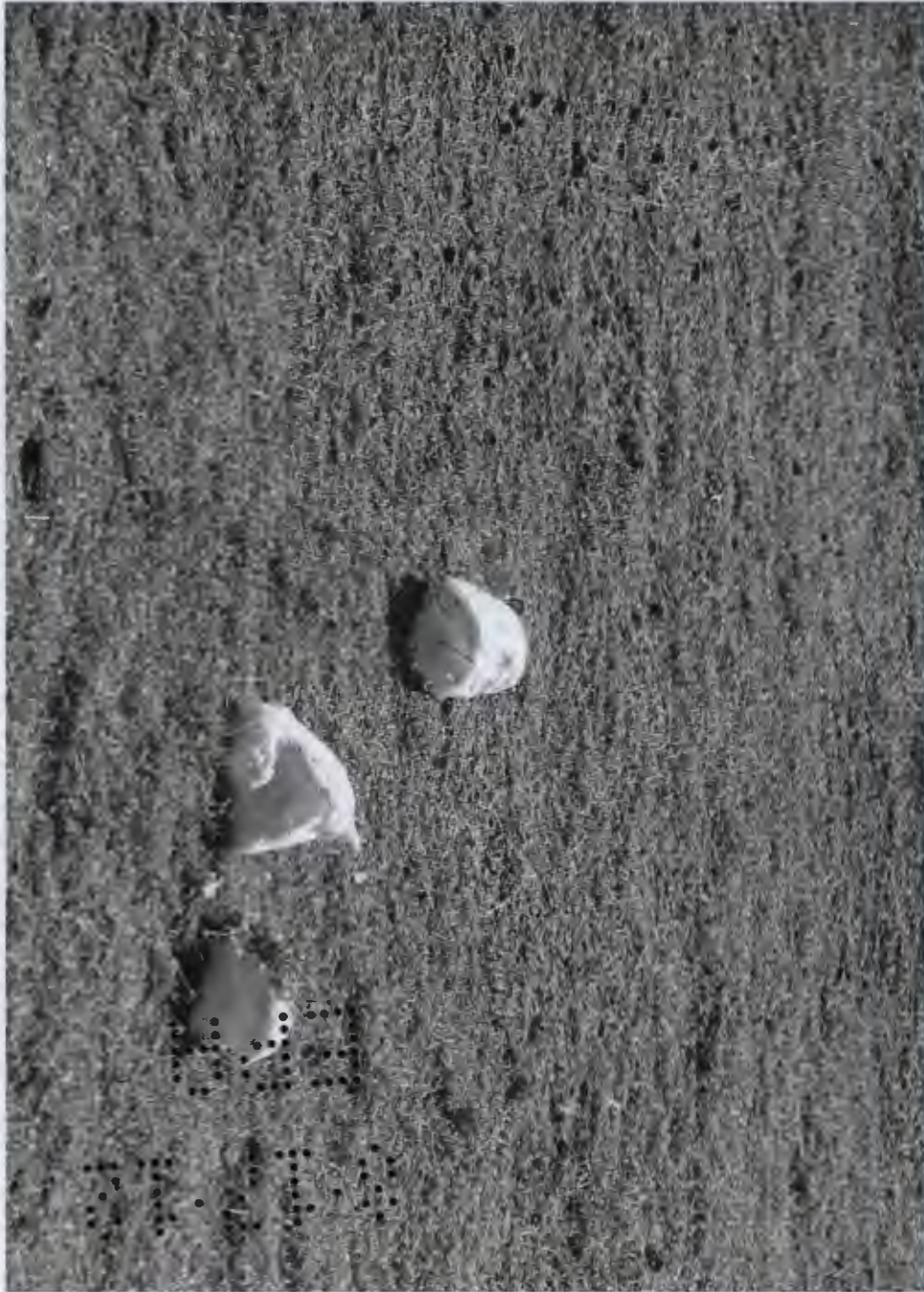


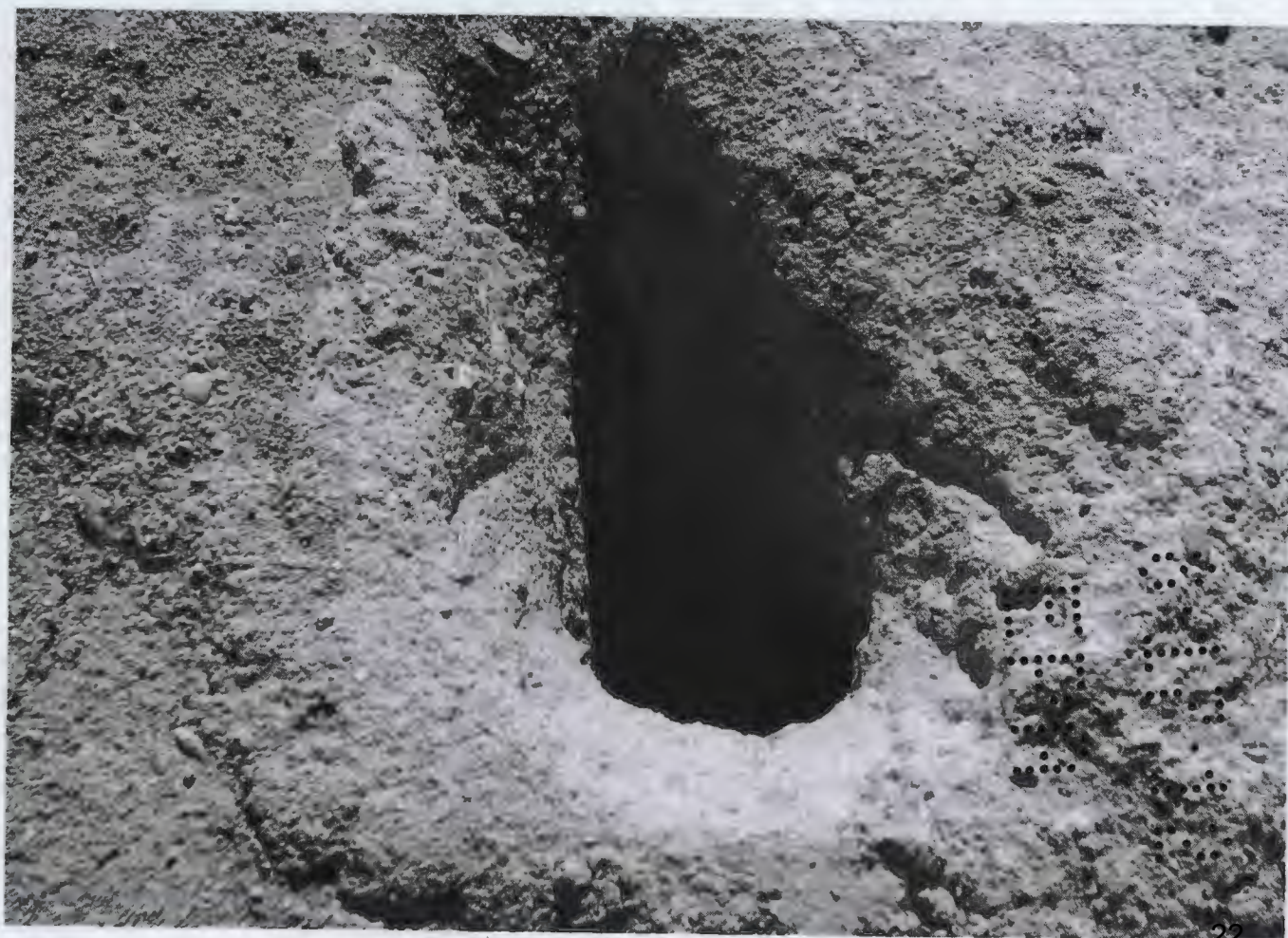
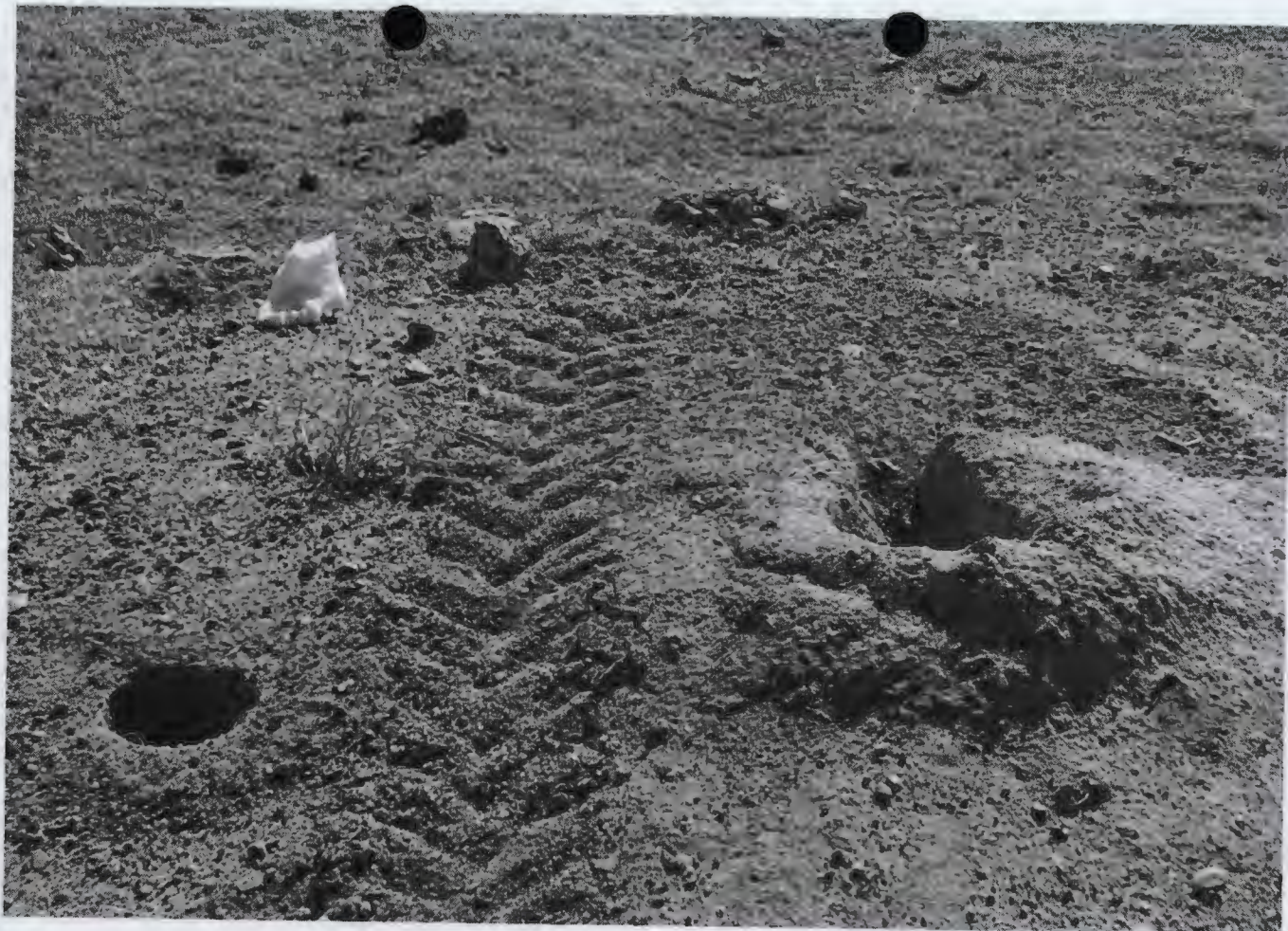












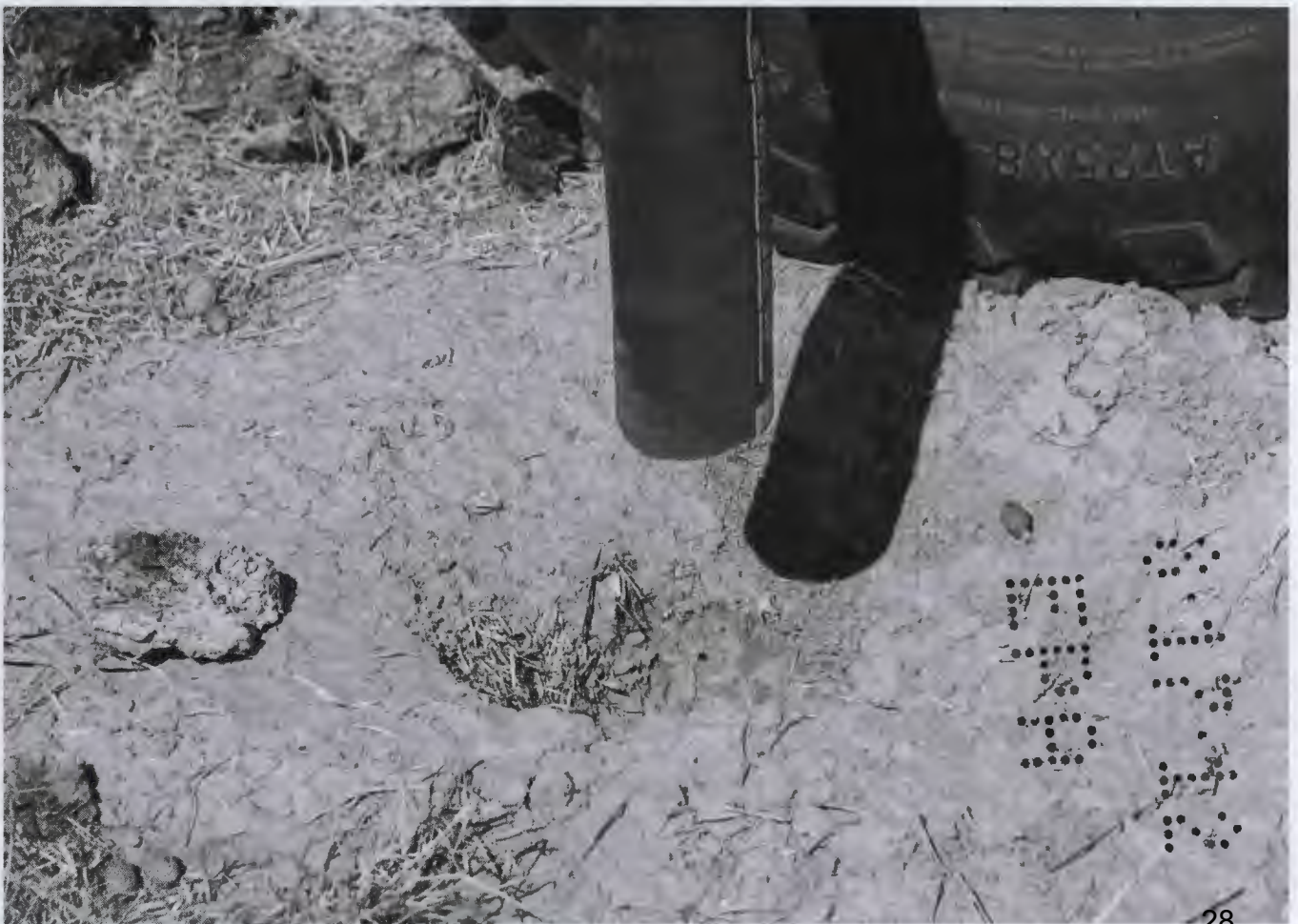


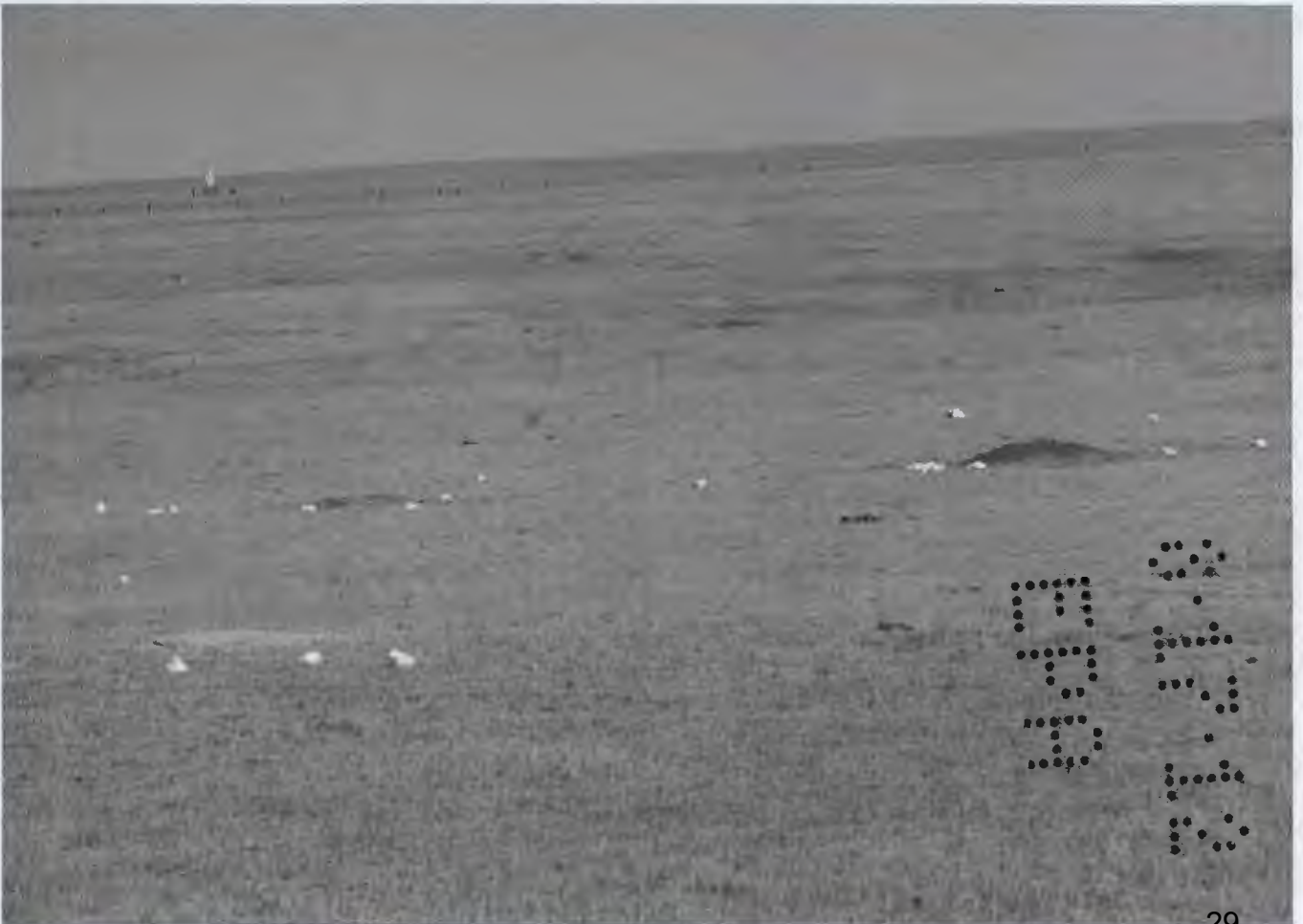






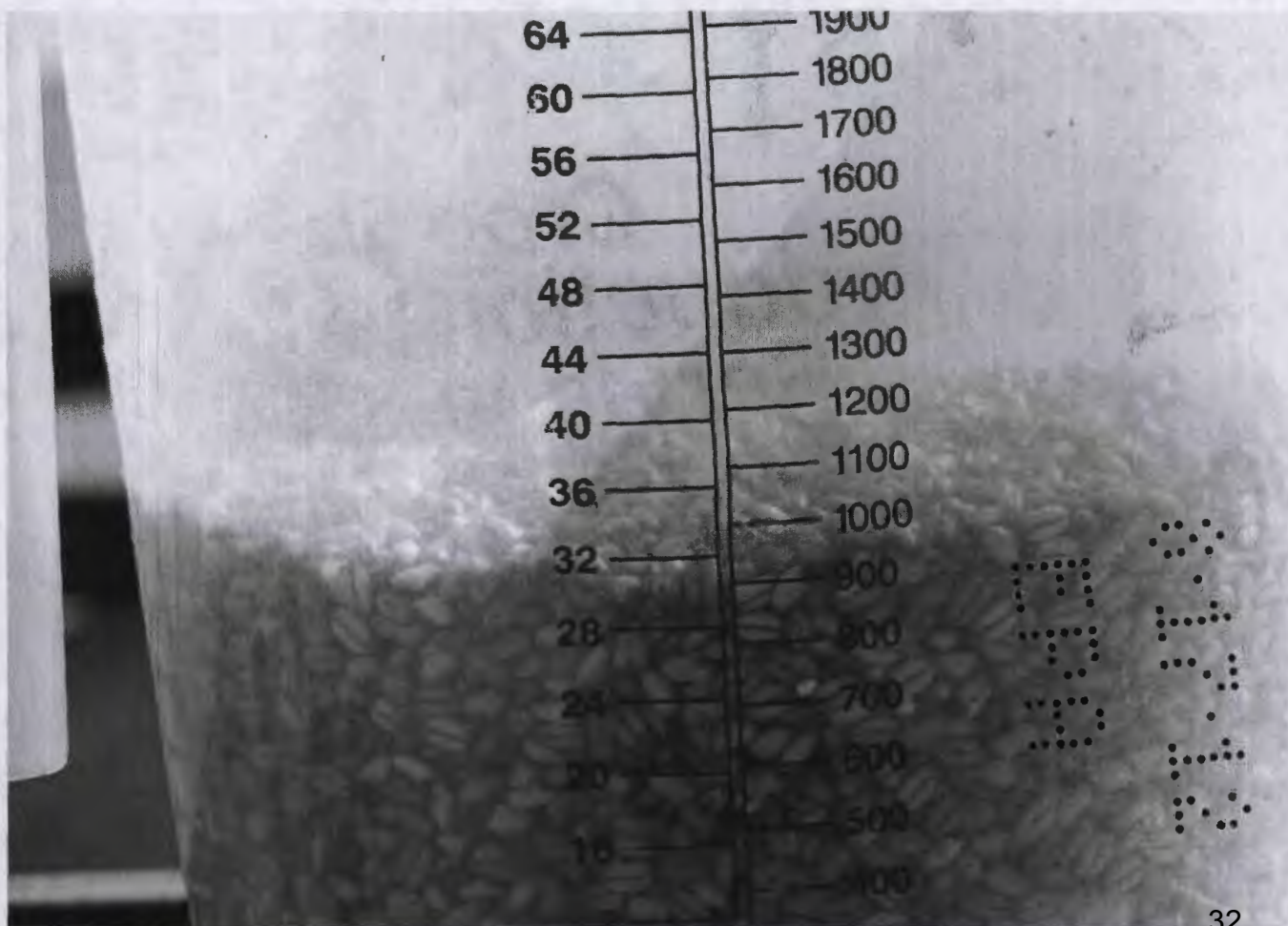
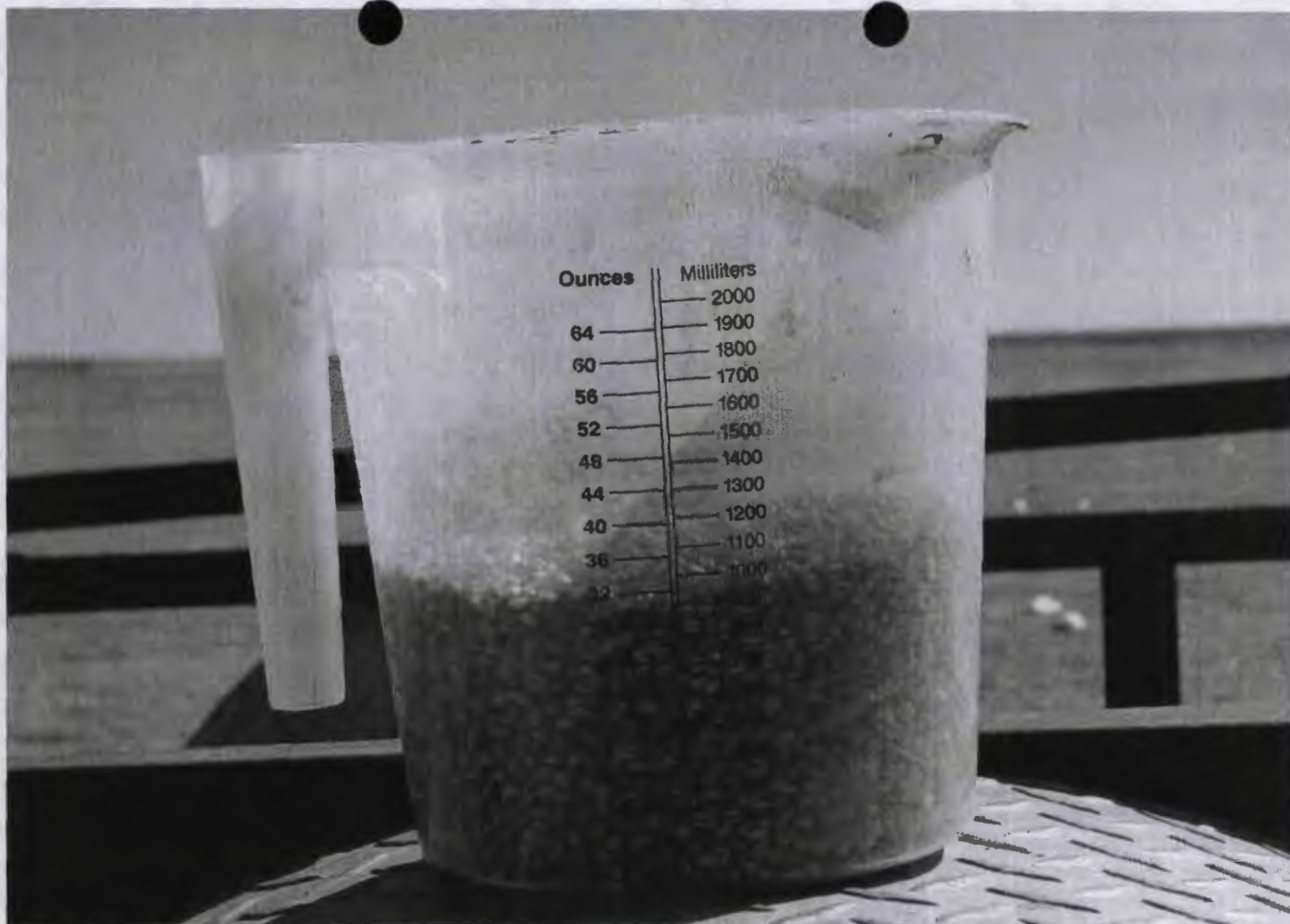




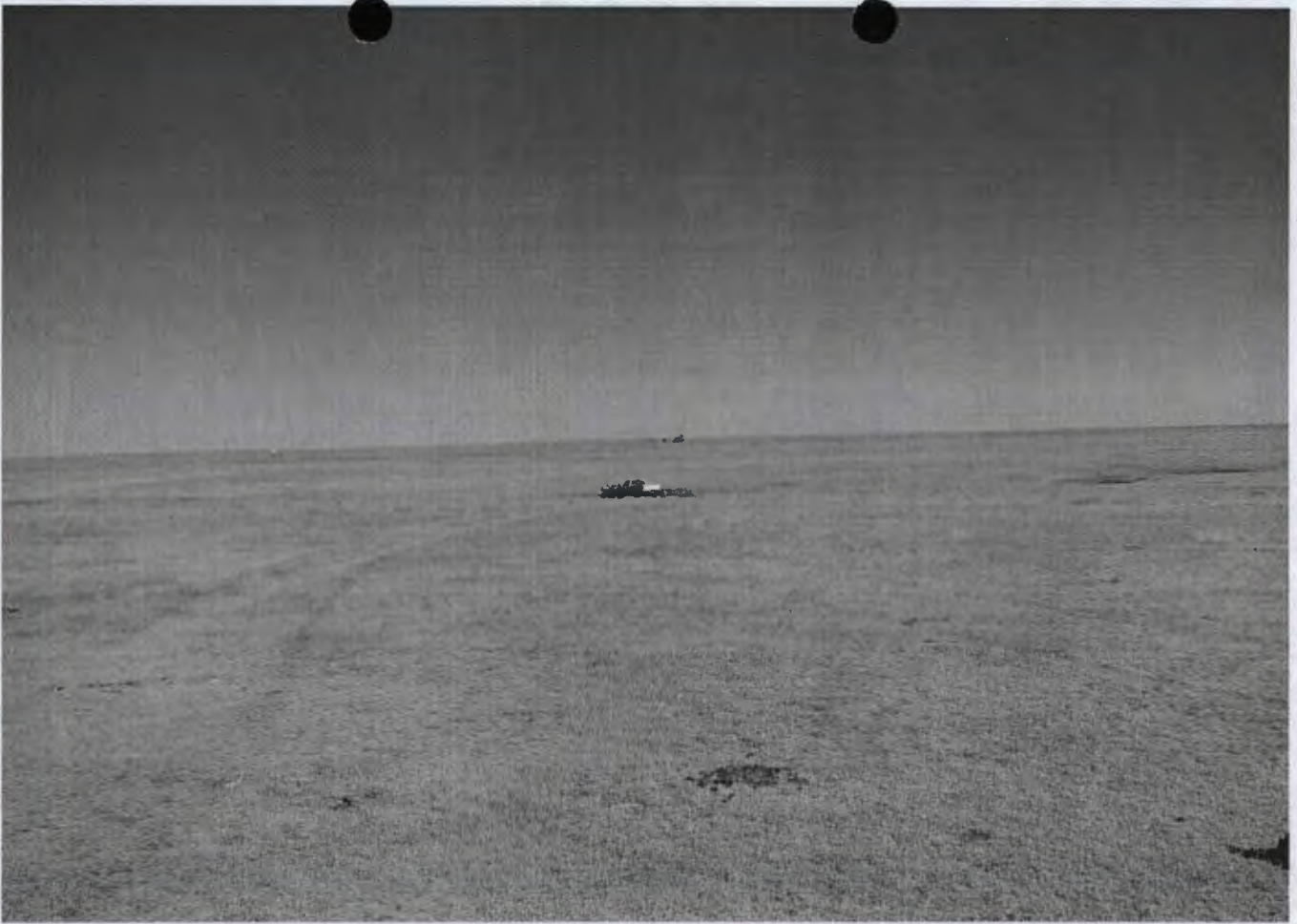












34

Ms. Judy Glass, Pesticide Registration Specialist
Kansas Department of Agriculture
109 SW 9th Street, 3rd floor
Topeka, KS 66612-1280

June 6, 2012

Re: Application for registration of
a FIFRA Sec. 24(c) special local need product

Dear Ms. Glass,

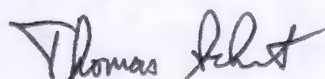
The enclosed application is submitted in order to register a "special local need" product for control of Black-tailed Prairie Dogs in Kansas. The proposed SLN existed last year as EPA SLN KS-110003, which expired on March 15, 2012. The proposed SLN label would allow Rozol Prairie Dog Bait to be applied using mechanical bait placement machines.

As you know, we have an application pending at US EPA to amend the label of Rozol Prairie Dog Bait to allow for mechanical bait application. However, EPA has indicated that they may issue a Federal Register notice concerning this use, and that approval may not be granted prior to the start of the application season for Rozol Prairie Dog Bait. The timing of this amend approval may also prevent inclusion of the revised instructions on packages that are shipped for early season use.

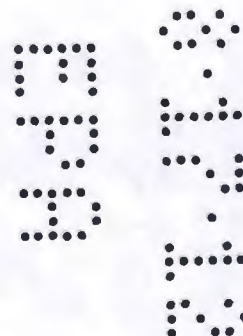
For these reasons, we request that this SLN be issued for the 2012-2013 application season. We have attached a proposed label that shows an expiration date of March 15, 2013. We have also enclosed the necessary KS application and fee of \$210.

Thank you for your attention to this matter, and please feel free to contact me directly if you have questions or concerns regarding this application.

Sincerely



Thomas J Schmit
Manager of Regulatory Affairs



August 10, 2012

Ms Tawanda Spears Maignan
Emergency Response Team Leader
U.S. EPA Office of Pesticide Programs I Registration Division
Risk Integration, Minor Use, and Emergency Response Branch
1200 Pennsylvania Avenue, NW (7504P)
Washington, DC 20460

Dear Ms. Maignan:

The Kansas Department of Agriculture has accepted for Special Local Need (SLN) registration the pesticide product Rozol® Prairie Dog Bait, EPA Registration Number 7173-286. The purpose of this SLN is to provide the farmers and ranchers of western Kansas the ability to apply product by use of a mechanical bait application machine in addition to the hand placement of bait described on the Section 3 label. The SLN is for the period of October 1, 2012 to March 15, 2013.

The need for this SLN is two-fold; to reduce exposure of applicators to chlorophacinone, and thus reduce the human health risks of using Rozol Prairie Dog Bait and to limit the economic impact of inefficient control of the black tailed prairie dog.

The Rozol Prairie Dog Bait label states:

- CAUTION: Harmful if swallowed or absorbed through the skin because it may reduce the clotting ability of blood and cause bleeding.
- Do not get in eyes on skin or on clothing. All handlers (including applicators) must wear shoes plus socks, and gloves.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing.
- As soon as possible, wash hands thoroughly after applying bait....

The MSDS for Rozol Prairie Dog Bait states:

- May be harmful if swallowed or absorbed through skin....
- Chronic effects: Prolonged or repeated exposure to small amounts of product can produce cumulative toxicity. Symptoms of toxicity include lethargy, loss of appetite, reduced clotting of blood, and bleeding.

The section 3 label for Rozol Prairie Dog Bait includes the following restriction on the label:

- "Only use forapplication methods specified on this label."

- **Application method:** Hand application of bait, at least 6 inches down prairie dog burrows. This Bait may only be used in underground applications. **Do not apply bait on or above ground level.....**
- **Application:** Apply ¼ cup (53 grams or nearly 2 ounces) of bait at least 6 inches down active prairie dog burrows. **Make sure no bait is left on the soil surface at the time of application.** Applicator must retrieve and dispose of any bait that is spilled above ground or placed less than 6 inches down the burrow entrance.

Mechanical baiting has been shown to be a safe and effective method of application. The baiting season is October 15 – March 15 when prairie dog natural food sources are at their lowest and there is greater bait acceptance. Environmental conditions such as wind, snow, frigid temperatures, etc. limit the time the bait is actually applied to about 30-40 days of the allowable baiting season. Applicator safety becomes an issue. Hand baiting has the potential of exposing the applicator to venomous snake bites and increased pesticide exposure.

Rozol Prairie Dog bait is a restricted use pesticide due to inhalation hazard. Hand baiting significantly increases primary inhalation during the baiting procedure but also secondary inhalation from the bait that adheres to the applicator's clothing. Hand baiting may involve dropping bait into a prairie dog burrow from a scoop used to measure the amount of bait. This may be done from hand height from a standing position. Short grass prairie areas are also typically regions that are windy. The average annual wind speeds for Goodland, KS (NW), and Dodge City, KS, (SW) are 12.5 mph and 14 mph, respectively. The greater the distance above the hole that the bait is released will increase the amount of bait that does not reach the bottom of the burrow opening. One would assume the lower height the bait was released by using the mechanical baiting device would be desirable when baiting under windy conditions. Human error related to fatigue and cold weather exposure will increase the amount of exposed bait on the surface and likely as not result in the bait not placed at least 6 inches below the surface as required by the label. Baiting by mechanical means has been shown to be reliable and to deliver a calibrated amount delivering the bait the mandatory 6 inches below the surface.

Original data submitted prior to the product obtaining a section 3 label was based on hand and mechanical data Lee and Hygnstrom (2007). Data was summarized from 70 trial days with 50 burrows each day. The methods of application were hand, mechanical and a combination of both. Baiting of the burrows was performed in the usual customary manner. The data was analyzed using SAS JMP one-way analysis of variance (ANOVA). Data collected specifically for the purpose of assessing accuracy of bait placement by three methods of application shows no significant differences among the methods. No significant differences were found at the $p < .10$ level between the means of the number of locations bait is visible nor the percentage of burrows where bait is visible, nor the distance from the surface that bait may have been visible, nor the approximate number of grains of bait that is visible. Mechanical baiting is the most efficient and cost effective way to accomplish the task of managing the prairie dog complexes.

Prairie dogs occupy approximately 130,000 acres of rangeland in Kansas. Conservative estimates of prairie dog density are 25 per acre with the range given as 5-35 prairie dogs/acre which in turn accounts for 30-50 6 inch burrows and mounds/acre. The stocking rate, defined simply as the number of acres necessary to feed an animal unit without overgrazing, ranges from 10-12 acres in western Kansas. To put this in terms of prairie dogs and cattle, 10 to 12 acres of rangeland are needed to support 1 steer OR 256 prairie dogs. Using the conservative estimate of 25 prairie dogs per acre, the 10 acres necessary to support the steer will contain about 250 prairie dogs. The land is capable of supporting either the steer or the prairie dogs, not both.

Mechanical baiting becomes a necessity considering a prairie dog mound or burrow may be found approximately every 900 to 1400 feet.

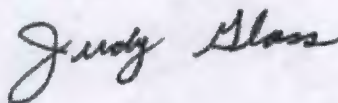
The market value of the livestock in the affected area is in excess of \$4,476,557,000 (incomplete data). A significant portion of the Kansas economy is related either directly or indirectly to livestock production. According to a six year study by Derner, Detling and Antolin, (2006) livestock weight gains decreased linearly depending on the amount of pasture occupied by prairie dogs.

By using a statistical method of regression analysis, they determined that each 10 percent of increased occupation resulted in a 2.1 percent reduction in weight gain. Weight gains decreased 5.5% when 20% of the pasture was colonized by prairie dogs and by 13.9% with 60% colonization. A pasture with a 20% prairie dog occupancy rate reduced the estimated value of livestock weight gain by \$14.95 per steer (March, 2006). A pasture with a 60% prairie dog occupancy rate reduced the estimated value of livestock weight gain by \$37.91 per steer (March, 2006). It is obvious that prairie dogs are a chronic condition hindering the maximization of rangeland production into livestock weight gain.

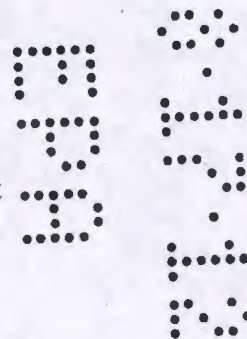
The reintroduction projects of the black-footed ferret in northwest Kansas rely on the ability to manage black-tailed prairie dog complexes. Mechanical baiting is the most efficient and cost effective way to accomplish the task of managing the prairie dog complexes and reestablishing the ferret so that the species could be removed from the state and federal endangered species list. The Manhattan, KS Regional office of the U.S. Fish and Wildlife Service and the Kansas Department of Wildlife, Parks and Tourism support this SLN. All other required determinations have been defined and the items required for EPA approval of the requested SLN are attached.

The Kansas Department of Agriculture has established the effective date of the SLN as October 1, 2012 and the assigned SLN number **KS-120002**. Please do not hesitate to contact me if you have any questions or concerns. I may be reached at 785-296-3454 or judy.glass@kda.ks.gov.

Sincerely,



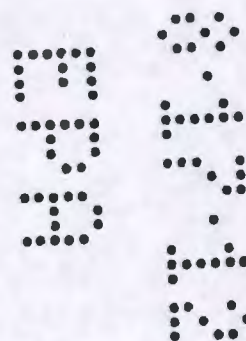
Judy Glass
Pesticide Registration Specialist



Attachments:

EPA Form 8570-25 Application for State Registration of a Pesticide to Meet a Special Local Need
Liphatech Request for SLN letter
Rozol Prairie Dog Bait 24(c) label
Rozol Prairie Dog Bait Section 3 label
Material Safety Data Sheet
KDA 24(c) incident report
Field Efficacy and Hazards of Rozol Bait for Controlling Black-Tailed Prairie Dogs (Cynomys ludovicianus) (Lee and Hygnstrom, 2007)
Field Efficacy and Hazards of Rozol Bait for Controlling Black-Tailed Prairie Dogs (Cynomys ludovicianus) (Lee and Hygnstrom, 2007) statistical analysis
Are Livestock Weight Gains Affected by Black-tailed Prairie Dogs? (Derner, Detling and Antolin, 2006)
2010 Kansas All Cattle Map (Page 42 Kansas Farm Facts 2010 USDA NASS)
US Fish and Wildlife Service Species Report
US Fish and Wildlife Service email communication
Kansas Wildlife, Parks and Tourism Letter

Cc: Heather Duncan, USEPA Region VII
Tom Schmit, Liphatech, Inc.
Jim Riemann, Kansas Department of Agriculture
Gary Meyer, Pesticide and Fertilizer Program Manager
Shawn Hackett, Field Staff Supervisor





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

August 21, 2012

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Kansas Department of Agriculture
Pesticide and Fertilizer Program
109 SW 9th Street
Topeka, KS 66612

ATTN: Judith L. Glass, Specialist

Dear State Agency:

The Office of Pesticide Programs acknowledges receipt of the Section 24(c) application/notification for KS120002.

The package is being forwarded to the Product Manager for review.

To ensure that the Agency receives proper notification of your 24(c) applications/notifications it is necessary to use the correct mailing address. All new 24(c) applications should be sent to the following:

Document Processing Desk (SLN)
Office of Pesticide Programs -7504P
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

If you have any questions concerning the administrative screening of the package please contact the Front End Unit at (703)305-5780.

Sincerely,

A handwritten signature in black ink, which appears to read "Barbara Russell", is written over the typed name.

Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division